REMARKS

Claims 1-29 are pending in the above identified application. The Examiner has rejected claims 1-29. Applicants herein traverse these rejections.[1]

Claim Rejections Under 35 U.S.C. § 102

The Examiner has rejected claims 1-6, 10-21, and 25-29 under 35 U.S.C. 102(b) as being anticipated by WO 99/30217 ("Gong"). However, Gong does not teach "controlling access to the first trusted class by the untrusted class or a second trusted class based upon the privilege information associated with the first trusted class," as is recited in both claims 1 and 25 or "a controller for controlling access to the first trusted class during a trusted class operation," as is recited in claim 18.

Gong teaches controlling access of a particular code to the computer based on permissions that apply to that code. Gong does not teach controlling access to more trusted code. As taught in Gong,

> [a]ccording to one aspect of the invention, protection domains are established based on policy data, where each protection domain is associated with zero or more permissions. An association is established between the protection domains and classes of objects (i.e. instantiations of the classes) that may be invoked by the computer system. When an object requests an action, a determination is made as to whether the action is permitted for that object. The determination is based on the association between the protection domains and the classes.

(Gong, p. 3, lines 6-12). As is further taught by Gong,

> [a]ccording to another aspect of the invention, when executing code causes a request for an action, a determination is made as to whether the action is permitted. The determination is based on the

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[1] Characterizations of both the claims of the present application and the teachings of various prior art are made throughout the Office Action. Applicants do not automatically agree or acquiesce in any of these characterizations, even if they are not specifically addressed in this response.

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> source of code of the code causing the request and the association between protection domains and sources of code executed by the computer system. According to another aspect of the invention, the association between protection domains and the sources of code is also based on public cryptographic keys associated with the sources of code.

(Gong, p. 3, line 36, -p. 4, line 3). As is indicated in these teachings, Gong teaches controlling access to the machine and does not teach controlling access to more trusted code. Therefore, Gong does not teach "controlling access to the first trusted class by the untrusted class or a second trusted class based upon the privilege information associated with the first trusted class," as is recited in both claims 1 and 25 or "a controller for controlling access to the first trusted class during a trusted class operation," as is recited in claim 18.

The Examiner cites Gong on p. 13, line 34, through page 14, line 27, as teaching these elements. However, in those pages, Gong teaches that a resource manager allows access to the resource after permission is granted. Gong does not teach controlling access to trusted code. As taught by Gong,

> Typically, access to a resource by code being executed by a code executor can only be made by invoking a resource manager. A resource manager is an object assigned the responsibility of managing access to its respective resource. A resource manager receives the request from object a. In response to receiving the request from object a, the resource manager assigned to manage the file system invokes an access controller. The access controller determines whether the permission required is authorized for the entity requesting access. In this example, access controller 280 is invoked by the resource manager that received the request from object c.

(Gong, p. 14, lines 4-12). As indicated here, the object is not provided access to the resource manager. Instead, the resource manager allows the object to access the resource, provided the access controller grants access. Therefore, the teachings indicated by Gong do not teach "controlling access to the first trusted class by the untrusted class or a second trusted class based

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upon the privilege information associated with the first trusted class," as is recited in both claims 1 and 25 or "a controller for controlling access to the first trusted class during a trusted class operation," as is recited in claim 18.

Therefore, claims 1, 18, and 25 are allowable over Gong. Claims 2-6 and 10-17 depend from claim 1 and are allowable for at least the same reasons as is claim 1. Claims 19-21 depend from claim 18 and are allowable for at least the same reasons as is claim 18. Claims 26-29 depend from claim 25 and are allowable for at least the same reasons as is claim 25.

Claim Rejections Under 35 U.S.C. § 103

The Examiner rejected claims 7-9 and 22-24 under 35 U.S.C. 103(a) as being unpatentable over Gong in view of Papa et al. Claims 7-9 depend from claim 1 and, as indicated above, are allowable over Gong. Similarly, claims 22-24 depend from claim 18 and are allowable over Gong for at least the same reasons as is claim 18. Papa et al. does not cure the defects in the teachings of Gong. As taught in Papa et al., a ticket management system controlling access by an object (or Java package). *See, e.g.,* Papa et al., abstract. However, again Papa et al. does not teach controlling access to a trusted object.

Therefore, neither Gong nor Papa et al. teach "controlling access to the first trusted class by the untrusted class or a second trusted class based upon the privilege information associated with the first trusted class," as is recited in both claim 1 or "a controller for controlling access to the first trusted class during a trusted class operation," as is recited in claim 18. Therefore, claims 7-9, which depend from claim 1, are allowable over the combination of Gong and Papa et al. Furthermore, claims 22-24, which depend from claim 18, are allowable over the combination of Gong and Papa et al.

Conclusion

In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.
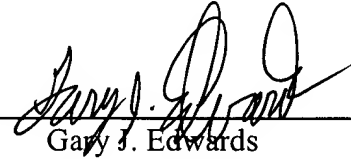
Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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